

E-filed 2/9/07

1 LERACH COUGHLIN STOIA GELLER
2 RUDMAN & ROBBINS LLP
3 SHAWN A. WILLIAMS (213113)
4 MONIQUE C. WINKLER (213031)
5 100 Pine Street, Suite 2600
6 San Francisco, CA 94111
7 Telephone: 415/288-4545
8 415/288-4534 (fax)
9 swilliams@lerachlaw.com
10 moniquew@lerachlaw.com

11 – and –

12 TRAVIS E. DOWNS III (148274)
13 BENNY C. GOODMAN III (211302)
14 THOMAS G. WILHELM (234980)
15 655 West Broadway, Suite 1900
16 San Diego, CA 92101
17 Telephone: 619/231-1058
18 619/231-7423 (fax)
19 travisd@lerachlaw.com
20 bgoodman@lerachlaw.com
21 twilhelm@lerachlaw.com

SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP
ERIC L. ZAGAR
ROBIN WINCHESTER
JAMES A. MARO
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610/667-7706
610/667-7056 (fax)
ezagar@sbtklaw.com
rwinchester@sbtklaw.com
jmaro@sbtklaw.com

22 Co-Lead Counsel for Plaintiffs

23 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

24 IN RE TRIDENT MICROSYSTEMS)
25 INC. DERIVATIVE LITIGATION)
26 _____) Master File No. C-06-3440-JF
27)
28 This Document Relates To:)
29)
30)
31)
32 All Actions)
33 _____)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND SCHEDULE
FOR FILING OF AMENDED
CONSOLIDATED COMPLAINT**

34 WHEREAS, this is a consolidated shareholder derivative action brought on behalf of Trident
35 Microsystems, Inc. (“Trident”) against certain officers and directors of Trident;

1 WHEREAS, Lead Plaintiffs filed their Consolidated Shareholder Derivative Complaint in the
2 instant action on November 7, 2006;

3 WHEREAS, the Individual Defendants and nominal defendant Trident (collectively
4 “Defendants”) filed their Motions to Dismiss Lead Plaintiffs’ Consolidated Derivative Complaint on
5 December 21, 2006;

6 WHEREAS, the deadline for Lead Plaintiffs’ response to the Motions to Dismiss Lead
7 Plaintiffs’ Consolidated Derivative Complaint is February 5, 2007;

8 WHEREAS, the parties have met and conferred regarding the scheduling of the Lead
9 Plaintiffs’ response to the Motions to Dismiss Lead Plaintiffs’ Consolidated Derivative Complaint;

10 WHEREAS, Lead Plaintiffs intend to file an Amended Consolidated Derivative Complaint;
11 and;

12 WHEREAS, the agreed-upon extension is not for the purpose of delay and promotes judicial
13 efficiency;

14 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, subject to
15 the approval of the Court, that Lead Plaintiffs shall no later than March 7, 2007 file and serve an
16 Amended Consolidated Derivative Complaint (“Amended Complaint”) which will supersede all
17 existing complaints filed in this action. Defendants need not respond to the pre-existing complaints and
18 Lead Plaintiffs need not respond to Defendants’ Motions to Dismiss Lead Plaintiffs’ Consolidated
19 Derivative Complaint; and

20 IT IS FURTHER STIPULATED AND AGREED that Nominal Defendant Trident’s response to
21 the Amended Complaint will be due no later than forty (40) days from the date of service. In the event
22 that Trident responds by a motion to dismiss the Amended Complaint for failure to plead that making a
23 demand would have been futile (pursuant to Fed. R. Civ. P. 23.1), Lead Plaintiffs shall file and serve

1 their opposition within forty-five (45) days after service of Trident's motion, and Trident shall file and
2 serve a reply to Lead Plaintiffs' opposition within fifteen (15) days after service of the opposition.
3 Trident will notice the motion for the earliest available hearing date accommodating this briefing
4 schedule, unless otherwise agreed by Trident and Lead Plaintiffs.

5 IT IS FURTHER STIPULATED AND AGREED that, if Trident files a motion to dismiss as
6 contemplated above, the Individual Defendants need not respond to the Amended Complaint unless and
7 until Trident's motion to dismiss is denied. If Trident's motion to dismiss is denied, or if Trident does
8 not file a motion to dismiss and instead files an alternative response, the Individual Defendants will file
9 and serve their responses to the Amended Complaint within forty-five (45) days of notice of the Court's
10 order denying Trident's motion to dismiss or Trident's filing of the alternative response.

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14 IT IS SO STIPULATED.

15
16 DATED: February 5, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SHAWN A. WILLIAMS
MONIQUE C. WINKLER

17
18
19 /s/
20 SHAWN A. WILLIAMS (213113)
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

1 LERACH COUGHLIN STOIA GELLER
2 RUDMAN & ROBBINS LLP
3 WILLIAM S. LERACH (68581)
4 DARREN J. ROBBINS (168593)
5 TRAVIS E. DOWNS III (148274)
6 655 West Broadway, Suite 1900
7 San Diego, CA 92101
8 Telephone: 619/231-1058
9 619/231-7423 (fax)

10 SCHIFFRIN BARROWAY TOPAZ
11 & KESSLER, LLP
12 ERIC L. ZAGAR
13 ROBIN WINCHESTER
14 JAMES A. MARO
15 280 King of Prussia Road
16 Radnor, PA 19087
17 Telephone: 610/667-7706
18 610/667-7056 (fax)

19 Co-Lead Counsel for Plaintiffs

20 I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file
21 this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I
22 hereby attest that CHARLES J. LANDY has concurred in this filing.

23 DATED: February 5, 2007

PILLSBURY WINTHROP SHAW
PITTMAN LLP
CHARLES J. LANDY
WALTER J. ROBINSON
THOMAS G. ALLEN

24
25 /s/
26 CHARLES J. LANDY
27 2475 Hanover Street
Palo Alto, CA 94304-1114
Telephone: 650/233-4500
650/233-4545 (fax)

28 PILLSBURY WINTHROP SHAW
PITTMAN, LLP
CHARLES J. LANDY
THOMAS G. ALLEN

STIPULATION AND [PROPOSED] ORDER TO EXTEND SCHEDULE
FOR FILING OF AMENDED CONSOLIDATED COMPLAINT

2300 N Street N.W.
Washington, D.C. 20037
Telephone: 202/663-8000
202/663-8007 (fax)

Counsel for Defendant John S. Edmunds

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that JUSTIN S. CHANG has concurred in this filing.

DATED: February 5, 2007

SHEARMAN & STERLING LLP
JEFFREY S. FACTER
JUSTIN S. CHANG

/s/
JUSTIN S. CHANG
525 Market Street
San Francisco, CA 94105
Telephone: 415/616-1100
415/616-1199 (fax)

Counsel for Defendant Frank C. Lin

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that SARAH A. GOOD has concurred in this filing.

DATED: February 5, 2007

HOWARD RICE NEMEROVSKI
CANADYFALK & RABKIN, PC
SARAH A. GOOD
CLARA J. SHIN
JASON S. TAKENOUCHI

/s/
SARAH A. GOOD
Three Embarcadero Center, Seventh Floor,
San Francisco, CA 94111-4024
Telephone: 415/434-1600
415/217-5910 (fax)

1
2 Counsel for Defendants Glen M. Antle, Jung-Herng
3 Chang, Peter Jen, Gerry Liu, John Luke, Amir
4 Mashkoori, Millard Phelps, and W. Stephen Rowe and
5 specially appearing for Yasushi Chikagami
6
7

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file
this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I
hereby attest that DAVID PRIEBE has concurred in this filing.

DATED: February 5, 2007

DLA PIPER US LLP
SHIRLI FABBRI WEISS
DAVID PRIEBE

11 /s/
12
13
14

DAVID PRIEBE
2000 University Avenue
East Palo Alto, CA 94303
Telephone: 650/833-2056
650/833-2001 (fax)

15 Counsel for Nominal Defendant Trident
16 Microsystems, Inc.
17
18

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 2/9/07



UNITED STATES DISTRICT JUDGE
JEREMY FOGEL

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Shawn A. Williams
SHAWN A. WILLIAMS

Lerach Coughlin Stoia Geller Rudman & Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: sWilliams@lerachlaw.com

Mailing Information for a Case 5:06-cv-03440-JF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Thomas Grimes Allen**
Thomas.Allen@pillsburylaw.com
- **Justin S. Chang**
jchang@shearman.com cflood@shearman.com
- **Jeffrey S. Facter**
jfacter@shearman.com cflood@shearman.com;rcheatham@shearman.com;jae.ko@shearman.com
- **Sarah A. Good**
sgood@howardrice.com bhastings@howardrice.com
- **Robert S. Green**
RSG@CLASSCOUNSEL.COM CAND.USCOURTS@CLASSCOUNSEL.COM
- **Jin H. Kim**
jkim@hrice.com
- **Charles J. Landy**
charles.landy@pillsburylaw.com
- **David Priebe**
david.priebe@dlapiper.com stacy.murray@dlapiper.com
- **Patrick David Robbins**
probbins@shearman.com
- **Clara Shin**
cshin@hrice.com ccamp@howardrice.com
- **Jason Takenouchi**
jtakenouchi@howardrice.com
- **Eric L. Zagar**
ezagar@sbclasslaw.com rwinchester@sbclasslaw.com;der_filings@sbclasslaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

James A. Maro

Schiffelin & Barroway, LLP
280 King of Prussia Road
Radnor, PA 19087